

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN OF PENNSYLVANIA**

<b>IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION LITIGATION</b>	§ § § § § § § § § §	<b>No. 12-md-2323 (AB)</b>  <b>MDL No. 2323</b>
<b>THIS DOCUMENT RELATES TO: ALL ACTIONS</b>		

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**RESPONSE IN OPPOSITION CO-LEAD CLASS COUNSEL'S MOTION  
TO STRIKE OR DISREGARD THE ALEXANDER OBJECTORS'  
UNAUTHORIZED SUR-REPLY 'RESPONSE AND OBJECTION' TO FEE  
PETITION REPLY PAPERS OR, ALTERNATIVELY, TO ACCEPT CLASS  
COUNSEL'S SUR-SURREPLY**

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Settlement Class Members Melvin Aldridge, Trevor Cobb, Jerry W. Davis, Michael Dumas, Corris Ervin, Robert Evans, Anthony Guillory, Wilmer K. Hicks, Jr., Richard Johnson, Ryan McCoy, Emanuel McNeil, Robert Pollard, Frankie Smith, Tyrone Smith, James A. Young Sr., and Baldwin Malcom Frank (collectively, the "Alexander Objectors") file this Response in Opposition to Co-Lead Class Counsel's Motion to Strike or Disregard the Alexander Objectors' Unauthorized Sur-Reply 'Response and Objection' to Fee Petition Reply Papers or, Alternatively, To Accept Class Counsel's Sur-Surreply (the "Petition") (ECF No. 7605, 7606). In short, Co-Lead Class Counsel's motion attempts to (i) circumvent Fed. R. Civ. P. 23(h)(2)'s notice and opportunity to be heard requirements, and (ii)

deprive the Alexander Objectors of the opportunity to preserve error through objection. For these reasons, and the reasons set forth in more detail in the accompanying Memorandum of Law, the Alexander Objectors respectfully request the Court deny the motion to strike or disregard. The Alexander Objectors are unopposed to Co-Lead Class Counsel's alternative motion to accept the self-titled "sur-surreply."

Date: May 12, 2017

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served on all counsel of record via the Court's ECF system on May 12, 2017.

/s/ Justin R. Goodman